

FILED

JUN 16 2006

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

BARRY J. PORTMAN
Federal Public Defender
JEROME E. MATTHEWS
Assistant Federal Public Defender
555 - 12th Street
Suite 650
Oakland, CA 94607-3627
Telephone: (510) 637-3500

Counsel for Defendant MICHAEL DOWNEY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-05 00651 CW [WDB]
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER MODIFYING RELEASE
vs.)	CONDITIONS
)	
MICHAEL DOWNEY, et al.,)	
)	
)	
Defendants.)	

Michael Downey recently learned that his mother, who of late has been in ill health, collapsed and presently is on life support in the intensive care unit at Rogue Valley Medical Center, Medford, Oregon. By prior stipulation and order of this Court, Mr. Downey was permitted to leave the New Bridge facility to spend time with his mother and family during this critical period. He did so, and returned to New Bridge without incident.

Following his return, Mr. Downey has learned that his mother has taken a turn for the worse. The family is now considering whether it is medically viable to continue life support. In addition, Mr. Downey's father, who has suffered a stroke, is not physically capable of managing family matters by himself. Mr. Downey therefore requests that he be permitted to leave New

STIP/ORD

cc: WDB's Stats 1 Copy to parties - via ECF
Pretrial, Financial, Sheriff

1 Bridge and assist his family, as necessary, all under the continued supervision of Pretrial
2 Services.

3 It is therefore STIPULATED AND AGREED that Mr. Downey may leave New Bridge
4 and travel out of district, to and including the State of Oregon, to spend time with his mother and
5 family, and assist them in this time of need. Mr. Downey may continue to do so, without further
6 order of this Court, as long as he first obtains permission from Pretrial Services.

7 /S/
8 Dated: June 16, 2006

KIRSTIN AULT
Assistant United States Attorney

10 /S/
11 Dated: June 15, 2006

JEROME E. MATTHEWS
Assistant Federal Public Defender

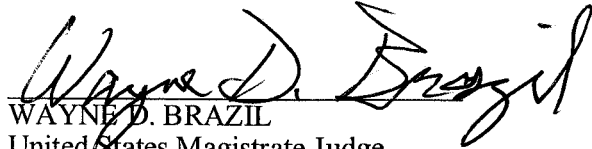
13 /S/
14 Dated: June 15, 2006

VICTORIA GIBSON
U.S. Pretrial Services Officer

15 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
16 "conformed" signature (/S/) within this e-filed document.

17 Good cause appearing therefor, IT IS ORDERED that Michael Downey may leave New
18 Bridge and travel out of district, to and including the State of Oregon, to spend time with his mother
19 and family for the reasons stated in the foregoing stipulation, and without further order of this Court.
20 Mr. Downey shall continue to be subject to supervision by Pretrial Services. Prior to booking any
21 travel or leaving New Bridge, Mr. Downey shall submit his travel plans and itinerary to the assigned
22 Pretrial Services Officer and obtain approval therefrom.

24 Dated: June 16, 2006

25 
WAYNE D. BRAZIL
United States Magistrate Judge